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Subject:  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Time-Critical Removal Action – Former Plainwell Impoundment  
Monthly Report (March 2008)

INDUSTRIAL

Dear Mike:

Date:  
April 15, 2008

Attached is the thirteenth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Contact:  
Steve Garbaciak

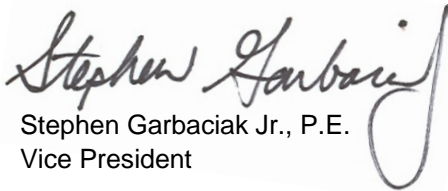
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312.332.4937 ext. 12

If you have any questions, please do not hesitate to contact me.

Email:  
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Sincerely,

ARCADIS

  
Stephen Garbaciak Jr., P.E.  
Vice President

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

**REPORT #13, MARCH 2008**

**PREPARED BY ARCADIS  
APRIL 15, 2008**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**MICHAEL RIBORDY, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #13, MARCH 2008**

**Significant Developments and Activities during the Period**

- On March 3, the Kalamazoo River Study Group (KRSRG) submitted copies of the 36<sup>th</sup> and 37<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to the United States Environmental Protection Agency (USEPA) and the Michigan Department of Environmental Quality (MDEQ).
- On March 4, the KRSRG submitted the agenda for the TCRA 2008 pre-construction coordination meeting to USEPA and MDEQ.
- On March 5, the KRSRG, USEPA, MDEQ, and Michigan Department of Natural Resources (MDNR) attended the TCRA 2008 pre-construction and coordination meeting in Plainwell.
- On March 12, the KRSRG received a draft copy of the USEPA Press Release titled *Plainwell PCB Cleanup Progress, Updates, and Public Meeting*.
- On March 14, the KRSRG submitted a figure showing the 2008 targeted removal areas to USEPA.
- On March 14, the KRSRG provided comments to USEPA on the draft copy of the Press Release titled *Plainwell PCB Cleanup Progress, Updates, and Public Meeting*.
- On March 17, the USEPA issued the Press Release titled *Plainwell PCB Cleanup Progress, Updates, and Public Meeting*.
- On March 17, the KRSRG submitted the twelfth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for February 2008 to USEPA.
- On March 17, the KRSRG submitted a copy of the 38<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On March 17 and 31, the KRSRG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On March 26, the KRSRG submitted truck route information for the 2008 construction season to USEPA.
- On March 28, the KRSRG submitted a copy of the 39<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
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**Data Collected and Field Activities Conducted During the Period**

- During the week of March 3, the KRSG continued site preparation activities (clearing and grubbing and installation of staging areas and access roads) and hosted the TCRA 2008 pre-construction and coordination meeting. Wastewater samples W\_SA3S\_Influ\_0034, W\_SA3S\_Influ\_0035, W\_SA3S\_Influ\_0036, W\_SA3S\_Influ\_0037, W\_SA3S\_Influ\_0038 (influent port), W\_SA3S\_MidA\_0030, W\_SA3S\_MidA\_0031, W\_SA3S\_MidA\_0032, W\_SA3S\_MidA\_0033, W\_SA3S\_MidA\_0034 (midpoint port, right side), W\_SA3S\_MidB\_0034, W\_SA3S\_MidB\_0035, W\_SA3S\_MidB\_0036, W\_SA3S\_MidB\_0037, W\_SA3S\_MidB\_0038 (midpoint port, left side), W\_SA3S\_EffluA\_0030, W\_SA3S\_EffluA\_0031, W\_SA3S\_EffluA\_0032, W\_SA3S\_EffluA\_0033, W\_SA3S\_EffluA\_0034 (effluent port, right side), W\_SA3S\_EffluB\_0034, W\_SA3S\_EffluB\_0035, W\_SA3S\_EffluB\_0036, W\_SA3S\_EffluB\_0037 and W\_SA3S\_EffluB\_0038 (effluent port, left side) were collected from the 25 gallon per minute (GPM) water treatment system located at Staging Area 3S. Table A summarizes the samples collected. Solidified material from Staging Area 5S was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal. This material was excavated from the Phase 1 Cofferdam Area in January; it was then processed and subsequently stored at Staging Area 5S during the winter.
- During the week of March 10, the KRSG continued site preparation activities (clearing and grubbing and installation of staging areas and access roads), installed a stop log removal system at the water control structure and began preparations for the removal of the Phase 1 Cofferdam. Wastewater samples W\_SA3S\_Influ\_0039 (influent port), W\_SA3S\_MidA\_0035 (midpoint port, right side), W\_SA3S\_MidB\_0039 (midpoint port, left side), W\_SA3S\_EffluA\_0035 (effluent port, right side) and W\_SA3S\_EffluB\_0039 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. Table A summarizes the samples collected. Solidified material from Staging Area 5S was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal. This material was excavated from the Phase 1 Cofferdam Area in January; it was then processed and subsequently stored at Staging Area 5S during the winter.
- During the week of March 17, the KRSG continued site preparation activities (clearing and grubbing and installation of staging areas and access roads), installed scour protection downstream of the water control structure, installed new river closure signage and buoys and began to install resuspension controls in Removal Area 13B. Wastewater samples W\_SA3S\_Influ\_0040 (influent port), W\_SA3S\_MidA\_0036 (midpoint port, right side), W\_SA3S\_MidB\_0040 (midpoint port, left side), W\_SA3S\_EffluA\_0036 (effluent port, right side) and W\_SA3S\_EffluB\_0040 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. A duplicate of sample W\_SA3S\_EffluB\_0040 (W\_SA3S\_Dup\_0009) was also collected. Table A summarizes the samples collected. Trees and stumps from winter clearing and grubbing activities were loaded into

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trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of March 24, the KRSG continued site preparation activities (clearing and grubbing and installation of staging areas and access roads), completed installing scour protection downstream of the water control structure, and began excavating 200 linear feet of material located at the downstream end of Removal Area 13B. Two surface water samples (TS30000 and TS30001) were collected from locations 150 feet downstream and 100 feet upstream, respectively, of Removal Area 13B for polychlorinated biphenyls (PCB) analysis. Due to the proximity of the spillway, the surface water sample could not safely be collected from its usual distance of 300 feet downstream of the removal area. A rinse blank (TS30002) was also collected. Wastewater samples W\_SA3S\_Influ\_0041, W\_SA3S\_Influ\_0042, W\_SA3S\_Influ\_0043 (influent port), W\_SA3S\_MidA\_0037, W\_SA3S\_MidA\_0038, W\_SA3S\_MidA\_0039 (midpoint port, right side), W\_SA3S\_MidB\_0041, W\_SA3S\_MidB\_0042, W\_SA3S\_MidB\_0043 (midpoint port, left side), W\_SA3S\_EffluA\_0037, W\_SA3S\_EffluA\_0038, W\_SA3S\_EffluA\_0039 (effluent port, right side), W\_SA3S\_EffluB\_0041, W\_SA3S\_EffluB\_0042 and W\_SA3S\_EffluB\_0043 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. Table A summarizes the samples collected. Trees and stumps from winter clearing and grubbing activities were loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- Due to inclement weather, no work was conducted on March 31, and no samples were collected.
- As of March 31, approximately 40,000 cubic yards of material had been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, 13B, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2 and 3.

**Laboratory Data Received During the Period**

- During the week of March 3, the KRSG received total petroleum hydrocarbon (TPH) analytical data for sample K25768 (collected in February) and analytical data for wastewater samples W\_SA3S\_Influ\_0034, W\_SA3S\_Influ\_0035, W\_SA3S\_Influ\_0036, W\_SA3S\_Influ\_0037, W\_SA3S\_MidA\_0030, W\_SA3S\_MidA\_0031, W\_SA3S\_MidA\_0032, W\_SA3S\_MidA\_0033, W\_SA3S\_MidB\_0034, W\_SA3S\_MidB\_0035, W\_SA3S\_MidB\_0036, W\_SA3S\_MidB\_0037, W\_SA3S\_EffluA\_0030, W\_SA3S\_EffluA\_0031, W\_SA3S\_EffluA\_0032, W\_SA3S\_EffluA\_0033, W\_SA3S\_EffluB\_0034, W\_SA3S\_EffluB\_0035, W\_SA3S\_EffluB\_0036 and W\_SA3S\_EffluB\_0037.
- During the week of March 10, the KRSG received analytical data for aggregate samples K25768 (with the exception of TPH) (collected in February) and K25770 (TPH only) (collected in February), carbon samples Carbon 3 and Carbon 4 (collected in February), soil sample K25769 (collected in February),

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and wastewater samples W\_SA3S\_Influ\_0038, W\_SA3S\_MidA\_0034, W\_SA3S\_MidB\_0038, W\_SA3S\_EffluA\_0034 and W\_SA3S\_EffluB\_0038.

- During the week of March 17, the KRSG received analytical data for aggregate sample K25770 (with the exception of TPH) (collected in February) and wastewater samples W\_SA3S\_Influ\_0039, W\_SA3S\_Influ\_0040, W\_SA3S\_MidA\_0035, W\_SA3S\_MidA\_0036, W\_SA3S\_MidB\_0039, W\_SA3S\_MidB\_0040, W\_SA3S\_EffluA\_0035, W\_SA3S\_EffluA\_0036, W\_SA3S\_EffluB\_0039, W\_SA3S\_EffluB\_0040 and W\_SA3S\_Dup\_0009.
- During the week of March 24, the KRSG received analytical data for wastewater samples W\_SA3S\_Influ\_0041, W\_SA3S\_Influ\_0042, W\_SA3S\_MidA\_0037, W\_SA3S\_MidA\_0038, W\_SA3S\_MidB\_0041, W\_SA3S\_MidB\_0042, W\_SA3S\_EffluA\_0037, W\_SA3S\_EffluA\_0038, W\_SA3S\_EffluB\_0041 and W\_SA3S\_EffluB\_0042.
- On March 31, the KRSG received analytical data for wastewater samples W\_SA3S\_Influ\_0043, W\_SA3S\_MidA\_0039, W\_SA3S\_MidB\_0043, W\_SA3S\_EffluA\_0039 and W\_SA3S\_EffluB\_0043.
- The KRSG is awaiting analytical results for surface water samples TS30000, TS30001 and TS30002.

**Issues Encountered and Actions Taken**

- During the week of March 10, erosion of bank material was observed near the upstream portion of Removal Area 7B. This area was closely monitored throughout the month for further signs of erosion. KRSG is developing a plan to prevent further erosion; the utility pole in the area will be relocated to a more stable location.

**Developments Anticipated During the Next Reporting Period**

- During the week of April 1, the KRSG is scheduled to complete excavation of 200 linear feet of material located at the downstream end of Removal Area 13B and install resuspension controls in Removal Area 9B. The USEPA is scheduled to host a Public Meeting on April 2.
- During the week of April 7, the KRSG is scheduled to start soil/sediment removal in Removal Area 9B, complete construction of Staging Area 4N, and complete site restoration in Removal Area 13B.
- During the week of April 14, the KRSG is scheduled to grout the scour protection downstream of the water control structure, complete excavation activities in Removal Area 9B, and begin tree and shrub planting in Removal Areas 1 through 8.

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- During the week of April 21, the KRSG is scheduled to begin removal of the Phase 1 Cofferdam, continue tree and shrub replanting in Removal Areas 1 through 8, begin post-construction grading of Removal Area 9B, and install resuspension controls in Removal Areas 9A, 10B and 10B1.
- During the week of April 28, the KRSG is scheduled to continue removal of the Phase 1 Cofferdam, continue tree and shrub replanting in Removal Areas 1 through 8, remove the resuspension controls in Removal Area 9B, and begin excavation of Removal Areas 9A, 10B and 10B1.
- The KRSG will continue to submit the *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ in April.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in April.
- Throughout April, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA Administrative Order on Consent (AOC).

**Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #13, March 2008**

**Table A — Summary of Samples Collected and Data Received in March 2008**

| Sample ID                    | Sample Date | Data Received                         | Sample Delivery Group              | Laboratory       | Sample Location   | Analysis Conducted  | PCB Result    | PCB Action Limit      | Response Action  |
|------------------------------|-------------|---------------------------------------|------------------------------------|------------------|---|---|---------------|-----------------------|--|
| <b>Aggregate Samples</b>     |             |                                       |                                    |                  |   |   |               |                       |  |
| K25768                       | 02/19/08    | 03/03/08 (KAR Labs) and 3/10/08 (TAL) | 080579 (KAR Labs) and TCRA28 (TAL) | KAR Labs and TAL | 21AA aggregate from Brewer pit on Miller Road in Otsego for construction of Staging Area 4N and associated access roads                                     | TPH, PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides | < 0.055 mg/kg | 4                     | None, no constituents exceeded action limits                                     |
| K25770                       | 02/26/08    | 03/10/08 (KAR Labs) and 3/20/08 (TAL) | 080698 (KAR Labs) and TCRA30 (TAL) | KAR Labs and TAL | Sand to be mixed with the 21AA aggregate from Brewer pit on Miller Road in Otsego for construction of Staging Area 4N and associated access roads           | TPH, PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides | < 0.052 mg/kg | 4                     | None, no constituents exceeded action limits                                     |
| <b>Carbon Samples</b>        |             |                                       |                                    |                  |   |   |               |                       |  |
| Carbon 3                     | 02/18/08    | 03/11/08                              | TCRA29                             | TAL              | Disposal sample from the spent carbon from the former 500 GPM water treatment system. All other parameters were analyzed in sample Carbon 2 (November 2007) | RCI   | NA            | NA                    | None, samples analyzed for waste disposal information                            |
| Carbon 4                     | 02/18/08    | 03/11/08                              | TCRA29                             | TAL              | Disposal sample of the spent carbon from the 25 GPM water treatment system  | PCBs, TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals, RCI  | 1.4 mg/kg     | 50                    | None, samples analyzed for waste disposal information, material is classified as |
| <b>Soil Sample</b>           |             |                                       |                                    |                  |   |   |               |                       |  |
| K25769                       | 02/25/08    | 03/11/08                              | 080677                             | KAR Labs         | Pre-construction composite sample collected from Staging Area 4N. Sample composited from four corners and center of staging area                            | PCBs  | < 0.33 mg/kg  | None, baseline sample | None   |
| <b>Surface Water Samples</b> |             |                                       |                                    |                  |   |   |               |                       |  |
| TS30000                      | 03/27/08    | NR                                    | NR                                 | TAL              | 150' downstream of RA 13B   | PCBs  | -             | -                     | -  |
| TS30001                      |             |                                       |                                    |                  | 100' upstream of RA 13B   | PCBs  | -             | -                     | -  |
| TS30002                      |             |                                       |                                    |                  | Rinse Blank   | PCBs  | -             | -                     | -  |

See Notes on Page 5.



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**Table A — Summary of Samples Collected and Data Received in March 2008**

| Sample ID                 | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location  | Analysis Conducted | PCB Result | PCB Action Limit                   | Response Action                             |
|---------------------------|-------------|---------------|-----------------------|------------|--|--------------------|------------|------------------------------------|---|
| <b>Wastewater Samples</b> |             |               |                       |            |  |                    |            |                                    |   |
| W_SA3S_Influ_0034         | 03/03/08    | 03/05/08      | 080768                | KAR Labs   | Staging Area 3S, Discharge 34, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0030          |             |               |                       |            | Staging Area 3S, Discharge 34, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0030        |             |               |                       |            | Staging Area 3S, Discharge 34, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = 16 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0034          |             |               |                       |            | Staging Area 3S, Discharge 34, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0034        |             |               |                       |            | Staging Area 3S, Discharge 34, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0035         |             |               |                       |            | Staging Area 3S, Discharge 35, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0031          |             |               |                       |            | Staging Area 3S, Discharge 35, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0031        |             |               |                       |            | Staging Area 3S, Discharge 35, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0035          |             |               |                       |            | Staging Area 3S, Discharge 35, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0035        |             |               |                       |            | Staging Area 3S, Discharge 35, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0036         | 03/05/08    | 03/06/08      | 080818                | KAR Labs   | Staging Area 3S, Discharge 36, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0032          |             |               |                       |            | Staging Area 3S, Discharge 36, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0032        |             |               |                       |            | Staging Area 3S, Discharge 36, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0036          |             |               |                       |            | Staging Area 3S, Discharge 36, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0036        |             |               |                       |            | Staging Area 3S, Discharge 36, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |

See Notes on Page 5.

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Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #13, March 2008**

**Table A — Summary of Samples Collected and Data Received in March 2008**

| Sample ID                         | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location  | Analysis Conducted | PCB Result | PCB Action Limit                   | Response Action                             |
|-----------------------------------|-------------|---------------|-----------------------|------------|--|--------------------|------------|------------------------------------|---|
| <b>Wastewater Samples (cont.)</b> |             |               |                       |            |  |                    |            |                                    |   |
| W_SA3S_Influ_0037                 | 03/06/08    | 03/07/08      | 080838                | KAR Labs   | Staging Area 3S, Discharge 37, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0033                  |             |               |                       |            | Staging Area 3S, Discharge 37, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0033                |             |               |                       |            | Staging Area 3S, Discharge 37, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0037                  |             |               |                       |            | Staging Area 3S, Discharge 37, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0037                |             |               |                       |            | Staging Area 3S, Discharge 37, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0038                 | 03/07/08    | 03/10/08      | 080870                | KAR Labs   | Staging Area 3S, Discharge 38, influent sample             | PCBs               | 0.1 µg/L   | -                                  | -   |
| W_SA3S_MidA_0034                  |             |               |                       |            | Staging Area 3S, Discharge 38, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0034                |             |               |                       |            | Staging Area 3S, Discharge 38, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0038                  |             |               |                       |            | Staging Area 3S, Discharge 38, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0038                |             |               |                       |            | Staging Area 3S, Discharge 38, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0039                 | 03/14/08    | 03/17/08      | 080870                | KAR Labs   | Staging Area 3S, Discharge 39, influent sample             | PCBs               | 0.1 µg/L   | -                                  | -   |
| W_SA3S_MidA_0035                  |             |               |                       |            | Staging Area 3S, Discharge 39, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0035                |             |               |                       |            | Staging Area 3S, Discharge 39, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0039                  |             |               |                       |            | Staging Area 3S, Discharge 39, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0039                |             |               |                       |            | Staging Area 3S, Discharge 39, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |

See Notes on Page 5.

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Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #13, March 2008**

**Table A — Summary of Samples Collected and Data Received in March 2008**

| Sample ID                               | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location  | Analysis Conducted                 | PCB Result                     | PCB Action Limit   | Response Action  |
|---|-------------|---------------|-----------------------|------------|--|------------------------------------|--------------------------------|--|--|
| <b>Wastewater Samples (cont.)</b>       |             |               |                       |            |  |                                    |                                |  |  |
| W_SA3S_Influ_0040                       | 03/17/08    | 03/18/08      | 080990                | KAR Labs   | Staging Area 3S, Discharge 40, influent sample             | PCBs                               | < 0.1 µg/L                     | -  | -  |
| W_SA3S_MidA_0036                        |             |               |                       |            | Staging Area 3S, Discharge 40, midpoint sample, right side | PCBs                               | < 0.1 µg/L                     | -  | -  |
| W_SA3S_EffluA_0036                      |             |               |                       |            | Staging Area 3S, Discharge 40, effluent sample, right side | PCBs, TSS, P                       | < 0.1 µg/L                     | Monthly Average of 2.6 x 10-5 µg/L   | None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.06 mg/L, No Action Limit  |
| W_SA3S_MidB_0040                        |             |               |                       |            | Staging Area 3S, Discharge 40, midpoint sample, left side  | PCBs                               | < 0.1 µg/L                     | -  | -  |
| W_SA3S_EffluB_0040<br>[W_SA3S_Dup_0009] |             |               |                       |            | Staging Area 3S, Discharge 40, effluent sample, left side  | PCBs, TSS, P<br><br>[PCBs, TSS, P] | < 0.1 µg/L<br><br>[< 0.1 µg/L] | Monthly Average of 2.6 x 10-5 µg/L<br><br>[Monthly Average of 2.6 x 10-5 µg/L] | None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.05 mg/L, No Action Limit<br><br>[None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.05 mg/L, No Action Limit] |
| W_SA3S_Influ_0041                       | 03/26/08    | 03/27/08      | 081102                | KAR Labs   | Staging Area 3S, Discharge 41, influent sample             | PCBs                               | 0.1 µg/L                       | -  | -  |
| W_SA3S_MidA_0037                        |             |               |                       |            | Staging Area 3S, Discharge 41, midpoint sample, right side | PCBs                               | < 0.1 µg/L                     | -  | -  |
| W_SA3S_EffluA_0037                      |             |               |                       |            | Staging Area 3S, Discharge 41, effluent sample, right side | PCBs, TSS                          | < 0.1 µg/L                     | Monthly Average of 2.6 x 10-5 µg/L   | None: TSS = <4 mg/L, Action Limit = 45 mg/L  |
| W_SA3S_MidB_0041                        |             |               |                       |            | Staging Area 3S, Discharge 41, midpoint sample, left side  | PCBs                               | < 0.1 µg/L                     | -  | -  |
| W_SA3S_EffluB_0041                      |             |               |                       |            | Staging Area 3S, Discharge 41, effluent sample, left side  | PCBs, TSS                          | < 0.1 µg/L                     | Monthly Average of 2.6 x 10-5 µg/L   | None: TSS = <4 mg/L, Action Limit = 45 mg/L  |

See Notes on Page 5.

**Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #13, March 2008**

**Table A — Summary of Samples Collected and Data Received in March 2008**

| Sample ID                         | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location  | Analysis Conducted | PCB Result | PCB Action Limit                   | Response Action                             |
|-----------------------------------|-------------|---------------|-----------------------|------------|--|--------------------|------------|------------------------------------|---|
| <b>Wastewater Samples (cont.)</b> |             |               |                       |            |  |                    |            |                                    |   |
| W_SA3S_Influ_0042                 | 03/27/08    | 03/28/08      | 081118                | KAR Labs   | Staging Area 3S, Discharge 42, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0038                  |             |               |                       |            | Staging Area 3S, Discharge 42, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0038                |             |               |                       |            | Staging Area 3S, Discharge 42, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0042                  |             |               |                       |            | Staging Area 3S, Discharge 42, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0042                |             |               |                       |            | Staging Area 3S, Discharge 42, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0043                 | 03/28/08    | 03/31/08      | 081143                | KAR Labs   | Staging Area 3S, Discharge 42, influent sample             | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_MidA_0039                  |             |               |                       |            | Staging Area 3S, Discharge 42, midpoint sample, right side | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluA_0039                |             |               |                       |            | Staging Area 3S, Discharge 42, effluent sample, right side | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_MidB_0043                  |             |               |                       |            | Staging Area 3S, Discharge 42, midpoint sample, left side  | PCBs               | < 0.1 µg/L | -                                  | -   |
| W_SA3S_EffluB_0043                |             |               |                       |            | Staging Area 3S, Discharge 42, effluent sample, left side  | PCBs, TSS          | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |

**Notes:**

- \* Duplicate samples are shown in brackets.
- \* Analytical results have not been validated.

GPM - gallon per minute  
NA - not analyzed  
NR - not received  
P - Phosphorus  
PCBs - Polychlorinated Biphenyls

RA - Removal Area  
RCRA - Resource Conservation and Recovery Act  
RCI - Reactivity, Corrosivity, Ignitability  
SVOCs - Semi-Volatile Organic Compounds  
TAL - TestAmerica Laboratories

TCL - Target Compounds List  
TCLP - Toxicity Characteristic Leaching Procedure  
TPH - Total Petroleum Hydrocarbons  
TSS - Total Suspended Solids

VOCs - Volatile Organic Compounds  
mg/kg - milligrams per kilogram  
mg/L - milligrams per liter  
µg/L - micrograms per liter